

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

JOE FASANO, *et al.*,

Plaintiffs,

-v.-

GUOQING LI, *et al.*,

Defendants.

Civil Action No. 16-cv-8759 (KPF)

**NOTICE OF DEFENDANTS' MOTION  
TO DISMISS ON FORUM NON  
CONVENIENS GROUNDS**

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law in Support of Defendants' Motion to Dismiss on *Forum Non Conveniens* Grounds, the accompanying Declaration of Robin Hollington, Q.C., Declaration of Peggy Yu Yu on Behalf of E-Commerce China Dangdang, Inc., Declaration of Peggy Yu Yu on Behalf of Dangdang Holding Company Limited, Declaration of Guoqing Li on Behalf of Kewen Holding Company Limited, Declaration of Guoqing Li on Behalf of Science & Culture International Limited, and Declaration of Danqian Yao on Behalf of First Profit Management Limited, and the exhibits attached thereto, Defendants E-Commerce China Dangdang, Inc., Dangdang Holding Company Limited, Kewen Holding Company Limited, Science & Culture International Limited, and First Profit Management Limited, through the undersigned, hereby move this Court, before the Honorable Katherine Polk Failla, on a date and time to be set by the Court, for an order dismissing the Complaint with prejudice on *forum non conveniens* grounds.

Dated: March 15, 2017  
New York, New York

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